

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN

In re:

Charles Lau DDS MSD LLC
Debtors.

Case No. 23-10874
Chapter 11

**MOTION TO SHORTEN TIME AND REQUEST FOR EXPEDITED HEARING ON:
DEBTORS' (1) MOTION FOR INTERIM AND FINAL ORDERS (A) AUTHORIZING
USE OF CASH COLLATERAL AND (B) GRANTING ADEQUATE PROTECTION**

NOW COMES Charles Lau DDS MSD LLC, the debtor and debtor in possession herein (the “Debtor”), by its proposed counsel Krekeler Law, S.C., and makes this motion to shorten notice and to request a hearing on an expedited basis pursuant to 11 U.S.C. § 102(1) and Federal Rules of Bankruptcy Procedure (“FRBP”) 9006(c)(1) and 9007 authorizing shortened notice and expedited hearing (“Expedited Motion”), on Debtor’s Motion for Interim and Final Orders (A) Authorizing Use of Cash Collateral and (B) Granting Adequate Protection (“Motion for Use of Cash Collateral”) and hereby moves to shorten notice of the Motions requiring any objection to the Motions be received by two (2) business days prior to the commencement of a hearing to be scheduled by the Court.

This Motion is warranted for the following reasons. First, in order to operate its business during this reorganization and meet its ordinary business expenses, the Debtor must have immediate access to and the use of its cash collateral. Attached to the Cash Collateral Motion is a proposed budget for the Debtor’s use of cash collateral through and including August 31, 2023. The line items in the budget include the Debtor’s normal, ordinary course of business expenses, including employee wages and related withholdings. If the Debtor is not permitted to use cash

collateral, Debtor will be seriously harmed and may need to close down its operations. Moreover, the going concern value of this enterprise will be lost to the detriment of the Debtor's creditors and its estate.

WHEREFORE, Charles Lau DDS MSD LLC, respectfully requests that the Court enter an order approving shortened notice whereby any objection to the Motion be received two (2) business days prior to the commencement of a hearing to be scheduled by the Court.

Dated this 26th day of May, 2023.

Krekeler Law, S.C.

By: /s/ John P. Driscoll
John P. Driscoll, SBN 1091318
*Proposed Attorneys for the
Debtor in Possession,*
Charles Lau DDS MSD, LLC